

GABRIEL L. GRASSO, ESQ.
Nevada Bar No. 7358
GABRIEL L. GRASSO, P.C.
411 South 6th Street
Las Vegas, NV 89101
T: (702) 868-8866
F: (702) 868-5778
E: gabriel@grassodefense.com
Attorney for ELKIND

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHEENA ELKIND,

Defendant.

Case No.: 2:20-mj-00709-BNW-1

**STIPULATION TO CONTINUE
PRELIMINARY EXAMINATION DATE**

(EIGHTH REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, District of Nevada, and Shaheen Torgoley, Assistant United States Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel for SHEENA ELKIND, that the Preliminary Examination hearing currently scheduled for July 6, 2021 at 10:00 a.m., be vacated and set to a date and time convenient to this court but no sooner than forty five (45) days.

The Stipulation is entered into for the following reasons:

1. Counsel for the defendant needs additional time to review available discovery.
Additionally, newly assigned government counsel needs additional time to become familiar with the case.
2. Mr. ELKIND is on Pretrial Release and does not object to the continuance.
3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
5. Denial of this request for continuance would result in a miscarriage of justice.
6. The additional time requested by this Stipulation is excusable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).
7. This is the eighth request for a continuance of the preliminary hearing date in this case.

DATED this 1st day of July, 2021.

GABRIEL L. GRASSO, P.C.
Counsel for SHEENA ELKIND

CHRISTOPHER CHIOU
Acting United States Attorney

By /s/ Gabriel L. Grasso
GABRIEL L. GRASSO, ESQ.

By /s/ Shaheen Torgoley
Assistant United States Attorney

GABRIEL L. GRASSO, ESQ.
Nevada Bar No. 7358
GABRIEL L. GRASSO, P.C.
411 South 6th Street
Las Vegas, NV 89101
T: (702) 868-8866
F: (702) 868-5778
E: gabriel@grassodefense.com
Attorney for ELKIND

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
SHEENA ELKIND,)
)
)
Defendant.)
_____)

Case No.: 2:20-mj-00709-BNW-1

**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore,
the Court finds that:

1. Counsel for the defendant needs additional time to review available discovery.
Additionally, newly assigned government counsel needs additional time to
become familiar with the case.
2. Mr. ELKIND is on Pretrial Release and does not object to the continuance.
3. The parties agree to the continuance.
4. The additional time requested herein is not sought for purposes of delay, but
merely to allow counsel for defendant sufficient time within which to be able to
effectively and complete investigation of the discovery materials provided.
5. Denial of this request for continuance would result in a miscarriage of justice.

6. The additional time requested by this Stipulation is excusable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

CONCLUSIONS OF LAW

The continuance sought herein is excusable under the Speedy Trial Act, Title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently scheduled for July 6th, 2021, at 10:00 a.m., be vacated and continued to August 23, 2021

DATED July 6, 2021.